

REMARKS

Claims 1-14 and 16-20 are pending.

The Examiner objected to the numbering of the claims under 37 CFR 1.126 due to the inadvertent omission of a claim 15 in applicants' preliminary amendment filed June 10, 2002. Applicants apologize for the omission which was the result of a typographical error. Applicants canceled claim 15 and amended claim 16 in the preliminary amendment, however the claim number for claim 15 was "struck-through" rather than labeled as canceled. The above listing of the claims correctly identifies claim 15 as canceled. Applicants thank the Examiner for drawing attention to the inconsistency. Claims will be referred to in this response according to the claim numbers as herein amended and shown above.

Claims 1-5, 9, 10, 12, 13, 16, 17, 19 and 20 stand rejected under 35 USC 102(b) over European Patent Application EP 0920234 (hereinafter, "EP '234"). Applicants traverse this rejection.

Applicants have amended claim 1 to recite a second functional unit "providing supplementary features and controlling connections between the at least one first functional units via signaling." This feature is not disclosed or suggested by EP '234. EP '234 discloses tunneling narrowband call control messages through a broadband network (col. 2, line 38, through col. 3, line 21). EP '234 does not disclose a broadband network that provides any supplemental features to enhance the narrowband network's functionality. The broadband network of EP '234 transparently transmits narrowband call control messages between two narrowband nodes without modifying the content of the narrowband call control messages. Claim 1 is therefore allowable at least due to the second functional unit's introduction of supplementary features.

Claims 10, 19 and 20 have been similarly amended and are therefore allowable for at least the reasons detailed above.

Claims 6, 7, 14 and 18 stand rejected under 35 USC 103(a) over EP '234 in view of WO 93 15583 (hereinafter, "'583"). Applicants traverse this rejection.

Claims 6, 7, 14 and 18 depend from allowable claims 1 and 10. The '583 reference does not disclose or suggest a second functional unit "providing supplementary features and controlling connections between the at least one first functional units via signaling" as recited in claims 1 and 10 and discussed above. Therefore the combination of EP '234 and '583 fails to disclose all of the features recited in the independent claims. Claims 6, 7, 14 and 18 are therefore allowable for at least the reasons detailed above.

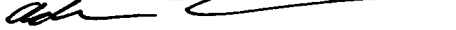
Furthermore, EP '234 teaches that "each network is virtually independent of the other" (see abstract). This teaches away from applicants' invention in which the first and second functional units are not independent; the first functional units provide basic call functionality and the second functional units provide supplementary features. There is no motivation in either EP '234 or '583 that would motivate one of ordinary skill in the art to combine EP '234 and '583 in such a way as to render applicants' invention obvious. Therefore, claims 6, 7, 14 and 18 are also allowable for this reason.

In view of the above, claims 1-14 and 16-20 are in condition for immediate allowance. Accordingly, applicants respectfully request that the Examiner withdraw the rejections and pass this application to issue.

In the event that the transmittal letter is separated from this document and the Patent Office determines that an extension and/or other relief is required, applicants petition for any required relief, including extensions of time, and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. 449122024600.

Respectfully submitted,

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By: 
Adam Keser
Registration No. 54,217
Morrison & Foerster LLP
1650 Tysons Boulevard
Suite 300
McLean, Virginia 22102
Telephone: (703) 760-7301
Facsimile: (703) 760-7777